

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION**

In re:  <b>Allen Kieth Walkowiak</b> Debtor(s)  <b>Allen Kieth Walkowiak</b> Movant, v. <b>FEDERAL HOME LOAN MORTGAGE CORPORATION, AS TRUSTEE FOR THE BENEFIT OF THE FREDDIE MAC SEASONED LOANS STRUCTURED TRANSACTION TRUST, SERIES 2019-1,</b> Respondents.	Bankruptcy <b>24-10288-pmm</b>  Chapter <b>13</b>  Related to Doc. No. <b>65</b>  Hearing: April 24, 2025 at 10:00 AM
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**LIMITED RESPONSE TO MOTION FOR SALE**

FEDERAL HOME LOAN MORTGAGE CORPORATION, AS TRUSTEE FOR THE BENEFIT OF THE FREDDIE MAC SEASONED LOANS STRUCTURED TRANSACTION TRUST, SERIES 2019-1 ("Secured Creditor"), by and through its undersigned attorney, hereby files its Limited Response Motion for Sale ("Motion") (DE#65) and in support thereof states as follows:

1. Secured Creditor holds a first lien on the subject property located at 4210 Allen Street Bethlehem, PA 18020. (the "Property").
2. This Court has exclusive jurisdiction over the property in question under 28 USC Section 1334.
3. On March 18, 2025, Allen Kieth Walkowiak ("Debtors") filed a Motion to Sale for a total sale price of \$471,000.00.
4. Upon review of internal records, the estimated payoff of Secured Creditor's lien as of April 1, 2025 is \$289,201.43. Secured Creditor will provide an updated payoff at or near the scheduled closing of the sale.

5. Secured Creditor does not object to the Debtor's Motion to the extent that any sale is subject to Secured Creditor's lien and that Secured Creditor's lien will be paid in full at the closing based upon an up to date payoff quote.

6. Secured Creditor is filing the within Limited Response in an abundance of caution, as Secured Creditor wants it to be clear that it should not be compelled to participate in a sale of the property absent payment in full of Secured Creditor's mortgage lien on the real property without being given the right to credit bid pursuant to 11 U.S.C. § 363(k).

7. Furthermore, Secured Creditor requests that failure to complete any sale within 90-days of entry of this Order will result in any Order authorizing the sale to be deemed moot.

**WHEREFORE**, Secured Creditor respectfully requests the Motion be conditionally granted, and any order granting the Motion shall include the terms identified herein; and for such other and further relief as the Court deems just and proper.

Dated: April 1, 2025

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PLLC  
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**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that I served the above captioned pleadings at the addresses specified below on April 1, 2025

The types of service made on the parties were:

By First-Class Mail:

**Allen Kieth Walkowiak**  
4210 Allen Street  
Bethlehem, PA 18020

**ZACHARY ZAWARSKI**  
The Law Office of Zachary Zawarski  
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Bethlehem, PA 18017

**SCOTT F. WATERMAN [Chapter 13]**  
Chapter 13 Trustee  
2901 St. Lawrence Ave. Suite 100  
Reading, PA 19606

**United States Trustee**  
Robert N.C. Nix Federal Building  
900 Market Street Suite 320  
Philadelphia, PA 19107

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